

VILLARREAL HUTNER PC
Lara Villarreal Hutner, Esq., Cal. Bar No. 178639
E-Mail: lhutner@vhattorneys.com
Tracy S. Todd, Esq., Cal. Bar No. 172884
E-Mail: ttodd@vhattorneys.com
575 Market Street, Suite 300
San Francisco, California 94105
Telephone: 415.543.4200
Facsimile: 415.512.7674

Attorneys for Defendants
APPLE AMERICAN GROUP LLC and
APPLE NORCAL LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

CAESAR OSAKAN, individually, on behalf
of all other similarly situated persons, and on
behalf of the California Labor and Workforce
Development Agency and the State of
California,

Plaintiffs,

v.

APPLE AMERICAN GROUP; APPLE
NORCAL, LLC; and DOES 1-20,

Defendants.

CASE NO. 4:08-cv-04722-SBA

**STIPULATION AND ORDER
CONTINUING CASE MANAGEMENT
CONFERENCE AND RELATED DATES
FOR SIXTY DAYS**

Pursuant to Local Rule 6-2 of the United States District Court for the Northern
District of California, it is hereby stipulated and requested by and between the Plaintiff Caesar
Osakan (mistakenly identified as Caesar Osakan in the First Amended Complaint) and Defendants
Apple American Group LLC and Apple Norcal LLC that the Court continue for sixty days the
Case Management Conference, which is currently scheduled for April 14, 2009, and the deadline
by which the parties must file a Joint Status Report, which is currently due on April 7, 2009. The
parties make this request to allow them time to explore potential settlement of this matter and to

further meet and confer over issues that could impact this litigation, including two agreements, one being a general release of claims previously executed by Plaintiff for which Defendants provided certain consideration, and the other being an agreement to arbitrate claims. In addition, Defendants have retained new counsel, and a Notice of Substitution of Counsel was filed with the Court on March 23, 2009. A sixty day continuance of these dates will also provide Defendants' new counsel of record time to familiarize themselves further with the case. As a result, the parties wish to preserve judicial resources and avoid any unnecessary law and motion practice in the interim.

IT IS SO STIPULATED.

Dated: March 25, 2009

VILLARREAL HUTNER PC

By: /s/ Lara Villarreal Hutner
LARA VILLARREAL HUTNER
Attorneys for Defendants
APPLE AMERICAN GROUP LLC and
APPLE NORCAL LLC

Dated: March 26, 2009

KLETTER & PERETZ

By: /s/ Yosef Peretz
YOSEF PERETZ
Attorney for Plaintiff
CAESAR OSKAN

ORDER

IT IS HEREBY ORDERED THAT the Case Management Conference currently scheduled for April 14, 2009 shall be CONTINUED to **June 17, 2009 at 3:15 p.m.** The parties shall meet and confer prior to the conference and shall prepare a joint Case Management Conference Statement which shall be filed no later than ten (10) days prior to the Case Management Conference that complies with the Standing Order For All Judges Of The Northern District Of California and the Standing Order of this Court. Plaintiffs shall be responsible for filing the statement as well as for arranging the conference call. All parties shall be on the line and shall call (510) 637-3559 at the above indicated date and time.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

March 26, 2009

By: 
THE HON. SAUNDRA BROWN ARMSTRONG